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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, NORTHERN DIVISION**

JOHN PALMER and JENNIFER KULAS,

Plaintiffs,

v.

KLEARGEAR.com,

Defendant.

**DECLARATION OF
AUBREY P. BROOME**

Case No. 1:13-cv-00175

Magistrate Judge Paul M. Warner

I, Aubrey P. Broome, hereby declare:

1. I am, and was at the time of all events described in this declaration, over 18 years old.
2. I am not a party to this case.
3. On December 23, 2013, I mailed a copy of the summons and complaint in this case, via certified mail through the United States Postal Service with the receipt of mailing postmarked by the post office, to the address then listed on KlearGear.com's website as the address for the corporation: KlearGear.com, 2939 Wilson Avenue SW, Grandville,


MI 49418-3502. On December 30, 2013, this mailing was returned to me by the U.S. Postal Service as undeliverable.

4. On January 7, 2014, having learned that KlearGear.com's website listed a new and different address as the address for the corporation, I mailed a copy of the summons and complaint in this case, via certified mail through the United States Postal Service with the receipt of mailing postmarked by the post office, to that address: KlearGear.com, 2885 Sanford Avenue SW, #19886, Grandville, MI 49418-1342. According to the website of the United States Postal Service, that copy was "refused" three times by someone at that address, once on January 9, 2014, and twice on January 10, 2014.
5. On February 6, 2014, having found an additional address listed on KlearGear.com's website, I mailed a copy of the summons and complaint in this case, via certified mail through the United States Postal Service with the receipt of mailing postmarked by the post office, to that address: KlearGear.com, Havaco Direct Inc., 9901 I.H. 10 West, Suite 800, San Antonio, TX 78230. On February 20, 2014, this mailing was returned to me by the U.S. Postal Service as undeliverable.
6. On February 6, 2014, I mailed a copy of the summons and complaint in this case, via certified mail through the United States Postal Service with the receipt of mailing postmarked by the post office, to the Michigan Bureau of Commercial Services (Department of Licensing and Regulatory Affairs) – Corporations Division, P.O. Box 30054, Lansing, MI 48909. With this mailing I included a check for \$3, as instructed by that office to complete service. According to the website of the United States Postal Service, this mailing was successfully delivered on February 10, 2014.

7. I emailed courtesy copies of the summons and complaint by email to legal@kleargear.com and collections@kleargear.com on January 7, 2014 and February 18, 2014, respectively.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 10 day of MAR, 2014


Aubrey P. Broome